

No. 15-2056

**IN THE
UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

G.G., by his next friend and mother, Deirdre Grimm,

Appellant,

v.

Gloucester County School Board,

Appellee.

On Appeal from the United States District Court
for the Eastern District of Virginia
Newport News Division

**UNOPPOSED MOTION FOR LEAVE TO FILE AMICUS BRIEF
IN SUPPORT OF APPELLANT**

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Pursuant to Federal Rule of Appellate Procedure 29, the World Professional Association for Transgender Health; Pediatric Endocrine Society; Child and Adolescent Gender Center Clinic at UCSF Benioff Children's Hospital; Center for Transyouth Health and Development at Children's Hospital Los Angeles; Gender & Sex Development Program at Ann & Robert H. Lurie Children's Hospital of Chicago; Fan Free Clinic; Whitman-Walker Clinic, Inc.; GLMA: Health Professionals Advancing LGBT Equality; Transgender Law and Policy Institute; Norman Spack, MD; and Michelle Forcier, MD (the "Proposed Amici") move for leave to file the accompanying amicus brief in support of Appellant G. Appellant G. has consented to the filing of this amicus brief. Appellee Gloucester County School Board does not oppose this motion for leave to file an amicus brief.

A. Interest of Amici Curiae

As discussed in greater depth in the accompanying amicus brief at pages 1-8, the Proposed Amici are healthcare professionals, including hospitals, physicians, nurses, psychologists, and social workers, who have particular expertise in child and adolescent development. The Proposed Amici have decades of experience providing support and healthcare to transgender individuals, including transgender adolescents. They are committed to developing the best practices and supportive policies to promote health, research, education, respect, dignity, and equality for transgender people in all settings. To that end, the Proposed Amici have an interest

in ensuring that legal decisions affecting the health and wellbeing of transgender people, and adolescents in particular, are consistent with current medical, scientific, and psychological understanding and consensus.

B. Reasons for Granting Leave to File

Leave to file an *amicus curiae* brief should be granted if the brief is “desirable” and “the matters asserted are relevant to the disposition of the case.” Fed. R. App. P. 29(b)(2). The proposed brief meets this standard.

An issue of central importance in this case is whether the Gloucester County School Board’s policy of denying G. access to the boys’ restroom, as recommended by his medical healthcare provider and permitted by his school, treated him unequally and denied him equal access to educational opportunities. This Court should grant the Proposed Amici leave to file an amicus brief because the Proposed Amici are well suited to bring to the Court’s attention the critical aspects of adolescent development that demonstrate the harm caused to G. by the school board’s exclusionary restroom policy. They are also well qualified to describe the medical consensus surrounding the appropriate support needed to foster the healthy development of transgender adolescents, support that is consistent with the treatment provided by G.’s medical healthcare provider and with the expert medical declaration filed in the district court. The proposed amicus brief will help this Court to understand why the district court erred in not crediting

the medical evidence submitted below and in misperceiving the discriminatory and harmful impact on G. of the school board's decision.

The Proposed Amici's amicus brief will aid the Court in its review of the district court's decision. The Proposed Amici therefore respectfully request that the Court grant them leave to file the accompanying amicus brief.

Respectfully submitted,

By their attorneys,

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Dated: October 28, 2015

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2015, I electronically filed the foregoing document with the United States Court of Appeals for the Fourth Circuit by using the CM/ECF system. I certify that the following parties or their counsel of record are registered as ECF Filers and that they will be served by the CM/ECF system:

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